

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BYRON GLENN WILLIS,

Plaintiff,

v.

ELITE RECOVERY SERVICES, INC.,

Defendants.

Case No.: 08 CV 3238

Judge Kendall

Magistrate Judge Mason

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE
PLEAD**

Defendant, ELITE RECOVERY SERVICES, INC., by its attorney, Todd P. Stelter, pursuant to Federal Rule of Civil Procedure 6(b), respectfully request that this court grant a 21 day extension of time, or up until July 31, 2008, to file a responsive pleading to plaintiff's complaint, and in support thereof, states as follows:

1. Plaintiff's complaint purports to state a claim under the Fair Debt Collection Practices Act against the defendants.
2. Plaintiff's Complaint was filed on June 4, 2008, and service was recently effectuated on defendants.
3. Defendants have not requested any previous extensions.
4. Defense counsel was recently retained and requires additional time to perform factual investigation prior to answering or otherwise pleading. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response.
5. Defense counsel has communicated with plaintiff's counsel and it has been indicated that there is no opposition to this motion.

WHEREFORE, defendants respectfully request this court grant an extension of time up to and including July 31, 2008, to file a responsive pleading to plaintiff's complaint.

Respectfully submitted,

By: _____ s/ Todd P. Stelter
One of Defendants Attorneys

David M. Schultz
Todd Stelter
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CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2008, I electronically filed **UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD** with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

Dan Edelman

dedelman@edcombs.com

Respectfully submitted,

By: s/Todd P. Stelter

David M. Schultz
Todd P. Stelter
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